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Ryan Flynn, Executive Director



December 17, 2018

Filed Via Regulations.gov

The Honorable Andrew Wheeler
Acting Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Comments by the New Mexico Oil and Gas Association on the proposed rule "Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Reconsideration" (Docket ID: EPA-HQ-OAR-2017-0483)

Dear Mr. Wheeler:

On behalf of its members, the New Mexico Oil and Gas Association (NMOGA) respectfully submits the following comments on the proposed rule "Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Reconsiderations" (Docket ID: EPA0-HQ-OAR-2017-0483).

Founded in 1929, NMOGA represents over 1,000 members who account for 95% of the oil and gas activity in New Mexico. NMOGA's diverse membership represents every aspect of the oil and gas industry in New Mexico, including exploration and production companies, refineries/processors, pipeline transporters, on-site field service companies, suppliers, and vendors. NMOGA is dedicated to promoting the safe and responsible development of oil and gas resources in New Mexico through advocacy, collaboration, and education.

Last year, oil and gas companies invested more than \$13 billion into the state producing nearly 200 million barrels of oil, a significant increase over 2016. While New Mexico is experiencing record production, which is attributed to improving technologies, it has also lowered its emissions from both the San Juan and Permian Basins. This production has resulted in significant revenue for both the state and local communities, while protecting the environment.

As NMOGA members will be impacted by these proposed changes, we encourage EPA to pursue cost effective emission control requirements that reduce VOC emissions (as well as Methane emissions as a co-benefit). NMOGA supports and endorses the comments submitted by the American Petroleum Institute (API) and the Independent Producers Association of America (IPAA), including (but not limited to) a reduced fugitive emissions monitoring frequency, clarifying storage tank applicability and incentivizing the use of enforceable limits through state permits, encouraging the development and use of emerging technologies as alternative means of emission limitation, and reducing recordkeeping and reporting requirements that are burdensome and provide no environmental benefit.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ryan', with a horizontal line underneath.

Ryan Flynn
Executive Director, NMOGA